



K. W. Richardson, Jr., P.E.
Director-Environmental Engineering



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500 Water Street - J275
Jacksonville, FL 32202

(PH) 352-1986
(FAX) (904) 359-4887

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September 30, 1994

Mr. Thomas Roehm
Manager, Industrial Facility Section
Division of Water Pollution Control
Department of Environment and Conservation
State of Tennessee
6th Floor, L&C Annex
401 Church St.
Nashville, TN 37243-1534

NASHVILLE ENVIRONMENTAL
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TENNESSEE DEPARTMENT
OF ENVIRONMENT
AND CONSERVATION
FACILITY

Notification of Soil Contamination
CSXT Radnor Yard, Nashville, TN
NPDES Permit Number TN0064955

Dear Mr. Roehm:

This transmittal is provided to inform you of the discovery of soil contamination at the CSXT Radnor Yard facility, in accordance with the notification provisions of NPDES Permit Number TN0064955. Soil contamination was discovered during a field investigation to characterize soils in an area of planned excavation. The area to be excavated is the location of new diesel fuel storage tanks; characterization of soil was necessary so that proper off-site soil disposition could be arranged. Six borings within the proposed excavation area were sampled at multiple depths. A total of 20 samples resulted, eight of which exhibited Total Petroleum Hydrocarbons-Diesel Range Organics (TPH-DRO) concentrations in excess of 100 mg/kg. The enclosed "Table 1" and two "Analytical Reports" summarize the analytical data. "Figure 1" and "Figure 2", which are being sent under separate cover (directly from Resource Consultants, Inc.), summarize boring and sampling locations in plan and profile.

Table 2?
Fig 1 & 2?

The majority of soil in the area of planned excavation is not contaminated (as contamination is defined in NPDES Permit No. TN0064955). Current construction plans for the new diesel fuel storage facility call for excavated soils to be disposed off-site.

All samples, with total TPH-DRO values of 100 mg/kg or greater were subsequently subjected to leachate testing by the Toxicity Characteristic Leaching Procedure (TCLP). Following this procedure, TPH-DRO analyses of the extract indicate that all of the leachate from these samples measure below 10 mg/kg (the upper limit for special waste disposal guidelines). Extract analysis of a full

Mr. Thomas Roehm

- 2 -

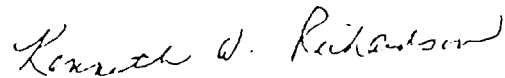
September 30, 1994

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range of TCLP List extraction parameters which included pesticides, herbicides, volatiles, semivolatiles, eight (RCRA) metals, as well as an assay for PCB's did not detect any other constituents above regulatory levels of concern. Summary analytical information is enclosed for your review.

As stipulated in NPDES Permit Number TN0064955, a remediation plan for addressing the contaminated soil will be submitted to your attention within 30 days. If you have any questions or require additional information, please contact Clark Causey or Linda Phipps of Resource Consultants, Inc. at (615) 370-6260.

Yours very truly,



Kenneth W. Richardson

Enclosures

cc:

K. Koster Burr, Esq.

Mr. C. R. Henderson, CSXT

Mr. V. M. Spero, CSXT

Mr. Ed Hockensmith, RCI

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CSX - RADNOR YARD
SOIL INVESTIGATION
DIESEL FUEL RECEIVING AND STORAGE AREA
TABLE 1

BORING #	AST-1	AST-1	AST-1	AST-2	AST-2	AST-2	AST-2	AST-2
DEPTH	1-3	3-5	5-9	1-3	3-5	5-7	7-9	9-12
DRO (wwb) mg/kg	13	11	9	<4	<4	<4	<4	21000
TS	78	86.7	84.1	77.9	70.9	85.4	75.8	70.8
DRD (dwb)	17	13	11	<5	<5	<5	<5	29661

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Administrative Services • Laboratory Services • Construction
 1721 Crossroads Boulevard • Brentwood, TN 37027
 (615) 373-5010 • FAX (615) 370-4738
 Consulting and Engineering Services
 1718 General George Patton Drive • Brentwood, TN 37027
 (615) 373-5919 • FAX (615) 370-8199
 250 Courthouse Court • Brentwood, TN 37027
 (615) 370-4560 • FAX (615) 372-3845

P.O. Box 1040
 Brentwood, Tennessee 37024-1040

Mr. William Cummings
 CSX Transportation Company
 500 Water Street
 Jacksonville, FL 32232-5057

September 14, 1994
 Project No. 08-4386.00

ANALYTICAL REPORT

Sample Description: Radnor Yards Soil Comb. AST-4, 3-A & 5-7			
Date Collected	9/1/94		
Date Collected	Not Reported		
Date Received	9/2/94		
MSL Sample Number	197514		
Toxicity Characteristic Leaching Procedure Extract Number	197515		
Zero Headpace Extract Number	197516		
pH (pH units)	6.9	2-12.5	D002
TCLP Extraction			
TCLP Metals			
Arsenic	<0.002	5.0	D004
Barium	2.6	100.0	D005
Cadmium	<0.005	1.0	D006
Chromium	<0.02	5.0	D007
Lead	<0.1	5.0	D008
Mercury	<0.002	0.2	D009
Selenium	<0.01	1.0	D010
Silver	<0.01	5.0	D011
TCLP Extractable Organics			
o-cresol	<0.10	200.0	D023
p-cresol	<0.10	200.0	D024
1,4-dichlorobenzene	<0.10	7.5	D025
1,2-dinitrobenzene	<0.10	0.13	D027
Hexachlorobenzene	<0.10	0.13	D030
Hexachlorobutadiene	<0.10	0.5	D032
Hexachloroethane	<0.10	3.0	D033
Nitrobenzene	<0.10	2.0	D034
Perchlorodiphenyl	<0.10	100.0	D036
Pyrene	<0.10	5.0	D037
2,4,5-trichlorophenol	<0.10	400.0	D041
2,4,6-trichlorophenol	<0.10	2.0	D042
TCLP Pesticides/Fertilizers			
Chlorpyrifos	<0.005	0.03	D070
Dieldrin	<0.005	1.00	D076
Heptachlor (and its epoxide)	<0.005	0.008	D012
Lindane	<0.005	0.4	D013
Methoxychlor	<0.005	10.0	D014
Toxaphene	<0.005	0.5	D015
2,4,5-TP (Sigma)	<0.5	1.00	D017
TCLP Volatile Organics			
Benzene	<0.10	0.5	D018
Carbon tetrachloride	<0.10	100.0	D019
Chlorobenzene	<0.10	6.0	D021
Chloroform	<0.10	0.5	D022
1,2-dichloroethane	<0.10	0.5	D023
1,1-dichloroethylene	<0.10	200.0	D024
Methyl ethyl ketone	<0.10	0.7	D025
Tetrachloroethylene	<0.10	0.5	D026
Trichloroethylene	<0.10	0.5	D027
Vinyl chloride	<0.10	0.2	D028
Typical Detection Limit	NA		
Hazardous Waste Number			
Regulatory Standards			
SW-846 (3rd Edition) Method No.			

All units are mg/L unless otherwise noted.
 TCLP: SW-846 Method 1311.

APPROVED

Mary Louise Linn
 Mary Louise Linn, Principal/Laboratory Services



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Administrative Services • Laboratory Services • FIELDWORK
7121 Creech Road, Boulevard • Brentwood, TN 37027
(615) 373-5000 • FAX (615) 370-4333

Consulting and Engineering Services
1710 General George Patton Drive • Brentwood, TN 37027
(615) 373-5019 • FAX (615) 370-8198

320 Southington Court • Brentwood, TN 37027
(615) 370-6260 • FAX (615) 373-3645

P.O. Box 1848
Brentwood, Tennessee 37024-1848

Mr. William Cummings
CSX Transportation Company, Radnor Yards
500 Water Street
Jacksonville, FL 32232-5057

September 14, 1994
Project No. 08-4386.00

ANALYTICAL REPORT

Sample Description:

Sample No. 197,616 - Soil Grab AST-4, 3-5' & 5-7' (relog of 197514)

Client Sample I.D.	AST-4, 3-5, 5-7
Sample Number	197,616
Date Collected	9/01/94
Time Collected	NR
Date Received	9/02/94

Diesel Range Organics (mg/kg)	189 wwB
Polychlorinated Biphenyls (mg/kg)	<0.02 wwB
Total Solids (%)	79.4

NR: Not reported.

Mary Louise

wwB: wet weight basis (or as received).

RC Laboratory Certification Numbers: AL-10400, AR-CA-1897, CT-01-0572, FL-087503, KS-E-204, E-1177, KY-00011, NY-10817, NC-274, PA-68310, TN-01007, WI-000640040

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PAGE 03